

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBS-ELKENANEY P/K/A  
TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

**DECLARATION OF BENJAMIN S. HALPERIN**

Benjamin S. Halperin declares as follows:

1. I am Counsel with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a MacMillan, and Universal City Studios LLC (collectively, the “Entangled Defendant”), in the above-captioned matter. I make this declaration in support of the Entangled Defendants’ and defendants Emily Sylvan Kim’s and Prospect Agency, LLC’s Response To Plaintiff Lynne Freeman’s (“Plaintiff”) Objections To Magistrate Judge Netburn’s January 11, 2023 Order.

2. Attached hereto as Exhibit A is a true and correct copy of the first six chapters of *Crave* by Defendant Tracy Wolff.

3. Attached hereto as Exhibit B is a true and correct copy of the first six chapters of *Masqued* by Plaintiff, the complete version of which was produced by Plaintiff in discovery bearing Bates Stamp LF06904-LF07371.

4. Attached hereto as Exhibit C is a true and correct copy of a document produced by Emily Sylvan Kim and Prospect Agency, LLC in discovery bearing Bates Stamp KIM00195441.

5. Attached hereto as Exhibit D is a true and correct copy of a document produced by Plaintiff in discovery bearing Bates Stamp LF050493- LF050495.

Dated: February 8, 2023  
New York, New York

  
Benjamin S. Halperin